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*Attorneys for Defendants Western Best, Inc.*  
*d/b/a Chicken Ranch; Western Best, LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

JANE DOE,

Plaintiff,

v.

JOSEPH LOMBARDO, Governor of Nevada, in  
his official capacity; AARON FORD, Attorney  
General of Nevada, in his official capacity; NYE  
COUNTY; ELKO COUNTY; STOREY  
COUNTY; WESTERN BEST, INC. D/B/A  
CHICKEN RANCH; WESTERN BEST, LLC;  
DESERT ROSE CLUB, LLC; HACIENDA  
ROOMING HOUSE, INC. D/B/A BELLA'S  
HACIENDA RANCH; MUSTANG RANCH  
PRODUCTIONS, LLC; D/B/A/ MUSTANG  
RANCH LUNGE, LLC; LEONARD "LANCE"  
GILMAN, in his official capacity; and  
LEONARD "LANCE" GILMAN, in his  
individual capacity,

Defendants.

Case No. 3:24-cv-00065-MMD-CSD

**NOTICE OF NON-COMPLIANCE**  
**WITH COURT ORDER**

Defendants Western Best, Inc. d/b/a Chicken Ranch and Western Best, LLC (the "Western Best Defendants"), by and through their counsel of record, the law firm of Fox Rothschild LLP, hereby submits this Notice of Non-Compliance with the Court's Order entered on April 4, 2025 (the "Order") [ECF No. 166].

On April 4, 2025, the Court entered an Order denying Plaintiff Jane Doe's ("Plaintiff") Motion for Reconsideration or in the Alternative, for Certification of an Interlocutory Appeal [ECF No. 145]. The Court further ordered that "Plaintiff must file a notice disclosing her identity

1 for the public docket within 15 days from the date of [the] order if she wishes to proceed with her  
2 remaining TVPRA claims as described in the Court's October 18, 2024, order [ECF No. 141]. *If*  
3 *Plaintiff fails to timely file such a notice, the Court will presume she does not wish to disclose her*  
4 *identity and will dismiss the case without prejudice.*" (Emphasis added).

5 As of the date of this filing, Plaintiff has failed to file a notice disclosing her identity  
6 thereby demonstrating her unwillingness to proceed with the remaining TVPRA claims.

7 Therefore, in consideration of the foregoing, Defendants respectfully request that this  
8 Court dismiss this action without prejudice.

9 DATED: April 23, 2025.

Respectfully submitted,

**FOX ROTHSCHILD LLP**

/s/ Deanna L. Forbush

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Defendants Western Best, Inc.

d/b/a Chicken Ranch; Western Best, LLC

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5, I certify that I am an employee of Fox Rothschild LLP and that on the 23<sup>rd</sup> day of April, 2025, I served a copy of the foregoing **NOTICE OF NON-COMPLIANCE WITH COURT ORDER** via the Court's CM/ECF filing system.

/s/ Jineen DeAngelis  
An Employee of Fox Rothschild LLP